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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

11 TIFFENY NANCE, on behalf of herself
12 and the Class Members,

13 Plaintiff,

14 | VS.

15 RYDER INTEGRATED LOGISTICS,
16 INC., a Delaware Corporation; and RYDER
SYSTEM, INC., a Florida Corporation,

Defendants.

Case No. 2:23-cv-00477-TLN-JDP
[Assigned to the Honorable Troy L.
Nunley]

**STIPULATION AND ORDER TO
STAY DISCOVERY FOR SIXTY
DAYS AND EXTEND
PLAINTIFF'S CLASS
CERTIFICATION DEADLINE BY
SIXTY DAYS**

Complaint Filed: March 13, 2023
Trial Date: None

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RYDER INTEGRATED LOGISTICS, INC.
8 and RYDER SYSTEM, INC.

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1 Plaintiff Tiffeny Nance (“Plaintiff”) and Defendants Ryder Integrated Logistics, Inc.
2 and Ryder System, Inc. (collectively, “Ryder”) (together the “Parties”), by and through their
3 undersigned counsel, hereby enter into the below stipulation with reference to the following
4 facts:

5 WHEREAS, on March 13, 2023, Plaintiff filed her class-action complaint for
6 damages against Ryder in the United States District Court for the Eastern District of
7 California, captioned *Tiffeny Nance v. Ryder Integrated Logistics, Inc. et al.*, Case No.
8 2:23-cv-00477 (Plaintiff’s “Class Action”);

9 WHEREAS, as relevant here, there are currently two related cases pending
10 against Ryder in the United States District Court for the Northern District of California:
11 *Perkins v. Hadco Santa Fe Springs CA dba Ryder Integrated Logistics, Inc.*, Case No.
12 3:23-cv-00502-WHO & 3:23-cv-01694-WHO (“Perkins”) and *Jose Johnson, et al. v.*
13 *Ryder Transp. Solutions, LLC*, Case No. 4:22-cv- 07456-JST (“Johnson”);

14 WHEREAS, on October 24, 2023, Ryder and the parties in the *Perkins* and
15 *Johnson* actions participated in a successful mediation and agreed to a settlement in
16 principle that, by definition, Ryder states encompasses the putative class and claims
17 alleged in Plaintiff’s Class Action;

18 WHEREAS, the Parties previously stipulated to extend the Phase I Discovery
19 Cutoff deadline by sixty days to March 12, 2024; and

20 WHEREAS, on January 3, 2024, the Parties stipulated to stay discovery in this
21 case by thirty days in exchange for Ryder providing the executed Settlement
22 Agreement to counsel in this case when it is fully executed, to give the Parties time to
23 meet and confer regarding the impact of the *Perkins/Johnson* settlement on this case.

24 WHEREAS, in response to the Parties’ stipulation, on January 3, 2024, the Court
25 signed an order staying discovery for thirty days;

1 WHEREAS, on February 1, 2024, the Parties stipulated to stay discovery for
2 another thirty days and to extend Plaintiff's deadline to file a motion for class
3 certification by sixty days, as the *Perkins/Johnson* settlement had not been fully drafted;

4 WHEREAS, in response to the Parties' stipulation, on February 1, 2024, the
5 Court signed an order staying discovery for thirty days and extending the deadline for
6 Plaintiff to file a motion for class certification by thirty days, making the current
7 deadline for Plaintiff to file her motion September 6, 2024;

8 WHEREAS, on February 29, 2024, the Parties stipulated to stay discovery for
9 another thirty days and to extend Plaintiff's deadline to file a motion for class
10 certification to October 7, 2024, as the *Perkins/Johnson* settlement was still undergoing
11 revisions but near completion;

12 WHEREAS, in response to the Parties' stipulation, on February 29, 2024, the
13 Court signed an order staying discovery for thirty days and extending the deadline for
14 Plaintiff deadline to file a motion for class certification to October 7, 2024;

15 WHEREAS, later that day, the Parties to the *Perkins/Johnson* matter executed
16 settlement agreement, a copy of which was provided to Plaintiff's counsel;

17 WHEREAS, on April 2, 2024, the Parties stipulated to stay discovery for another
18 sixty days and to extend Plaintiff's deadline to file a motion for class certification to
19 December 30, 2024, as the plaintiffs in the *Perkins/Johnson* matter represented to
20 Defendants in this case that their Motion for Preliminary Approval would be
21 forthcoming shortly;

22 WHEREAS, in response to the Parties' stipulation, on April 2, 2024, the Court
23 signed an order staying discovery for sixty days and extending the deadline for Plaintiff
24 to file a motion for class certification to December 30, 2024;

25 WHEREAS, the plaintiffs' counsel in the *Perkins/Johnson* matter filed their
26 Motion for Preliminary Approval on April 17, 2024, for which a hearing was held on
27 May 29, 2024, at 2:00 p.m. before the Honorable William H. Orrick of the United

1 States District Court for the Northern District of California and further briefing on
2 certain issues was requested and the hearing date was continued to July 19, 2024;

3 WHEREAS, on May 17, 2024, this Court in a related case, *Tiffeny Nance v.*
4 *Ryder Integrated Logistics, Inc., et al.*, Case No. 2:23-cv-02357-TLN-JDP, agreed to
5 continue keep the pending motions to consolidate (ECF No. 33) and motion to remand
6 (ECF No. 15) in abeyance pending the preliminary approval hearing and subsequent
7 ruling in the *Perkins/Johnson* matter;

8 WHEREAS, the Parties continue to meet and confer about the impact of the
9 *Perkins/Johnson* settlement on this case in order to determine whether settlement is
10 feasible at this juncture;

11 WHEREAS, the Parties agree that discovery in this case and all accompanying
12 deadlines should be stayed through the Court's anticipated ruling on the plaintiffs'
13 Motion for Preliminary Approval in the *Perkins/Johnson* matter in late July to
14 determine its impact on this case;

15 WHEREAS, the Parties agree that discovery in this case should be stayed for an
16 additional sixty days, all discovery deadlines should be continued by an additional sixty
17 days, and Plaintiff should receive a commensurate sixty day extension of her deadline
18 to file a motion for class certification;

19 IT IS HEREBY JOINTLY STIPULATED AND AGREED, by and between the
20 Parties through their respective counsel of record that:

21 1. The Parties agree that this Court enter an Order to continue to stay all
22 current and pending discovery in this case for sixty days from June 2, 2024 until August
23 1, 2024;

24 2. The Parties agree that this Court enter an Order stating that all current and
25 pending discovery deadlines be continued by sixty days; and

3. The Parties agree that this Court enter an Order extending Plaintiff's deadline to file a motion for class certification by sixty days, from December 30, 2024 to February 28, 2025.

IT IS SO STIPULATED.

Dated: June 3, 2024

SCHNEIDER WALLACE COTTRELL
KONECKY LLP

By: /s/ Carolyn H. Cottrell (as authorized on 6/3/24)
Carolyn H. Cottrell
Ori Edelstein
Attorneys for Plaintiff
TIFFENY NANCE

Dated: June 3, 2024

REED SMITH LLP

By: /s/ Tanner J. Hendershot
Mara D. Curtis
Rafael N. Tumanyan
Tanner J. Hendershot
Attorneys for Defendants
RYDER INTEGRATED
and RYDER SYSTEM,]

ORDER

Pursuant to the above Stipulation, and good cause appearing, **IT IS SO ORDERED** as follows:

1. All current and pending discovery in this case is stayed for sixty days from June 2, 2024 until August 1, 2024.

2. All current and pending discovery deadlines in this case are continued by sixty days.

3. Plaintiff's deadline to file a motion for class certification is extended by sixty days from December 30, 2024, to February 28, 2025.

Dated: June 3, 2024


Troy L. Nupley

Troy L. Nunley
United States District Judge

SIGNATORY ATTESTATION

The e-filing attorney hereby attests that concurrence in the content of the foregoing document and authorization to file the foregoing document has been obtained from the other signatory indicated by a conformed signature (/s/) within the foregoing e-filed document.

Dated: June 3, 2024

/s/ Tanner J. Hendershot
Tanner J. Hendershot